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**US Fish & Wildlife Service Environmental Assessment Scoping Process Comment Letter on  
Lexam Explorations, Inc. in the Baca National Wildlife Refuge.**

The Saguache County Commissioners appreciate this opportunity to comment during the NEPA process, in support of your mandate - to thoroughly address every protection of the Refuge to protect the public's interests, in alternatives offering "best-case" scenarios with specific mitigation actions to minimize impacts and avoid "unreasonable or unnecessary damage" to the water, ecology, wildlife or cultural resources of the Refuge.

Given that studies of the Refuge are in early stages and a Management Plan is not in place, any baseline studies that you would ordinarily do to inventory and protect the water, ecology, wildlife or cultural resources of the Refuge would be prudent in the vicinity of the proposed test wells, and any outlying areas that would be impacted.

The following would inform the processes of planning impact mitigation, supporting the accomplishment of the goals and mission of the UFWS, protecting the species and ecosystems that make the Refuge a precious natural resource locally, and for the enjoyment of national visitors.

- Identification and protection of rare, threatened and endangered botanical and wildlife species and ecological systems
- Identification and mitigation of impacts of roads, traffic, and industrial activities and installations to habitat - wildlife corridors and birthing grounds, forage areas, flyways, aquatics
- Establishing baseline water, soil, air quality levels and monitoring plans
- Establishing a monitoring plan for the occurrence and appropriate eradication of noxious/invasive weeds, and restoration, as needed
- Assessment and plans for protection of meadows, wetlands and riparian areas
- Assessment and measures to address potential impacts leading to contamination of soils, such as, but not limited to - vehicle "diapers"; proper handling, inventory, storage and disposal of all toxic/hazardous materials and substances
- Assessment of all chemicals used in the Refuge and potential health effects on wildlife, water and people
- Assessment and mitigation of impacts of natural gas & oil development on air quality and potential health effects on wildlife, water and people
- Magnitude and duration of sound impacts from transport vehicles, drilling rigs and compressors
- Identification and protection plan for cultural and archeological resources

- Establishing a response plan for any of the potential emergency situations that might arise within the Refuge, including but not limited to – ambulance calls, vehicular accidents, veterinarian, fire, toxic spill or contamination
- Establishing reclamation and restoration requirements to return the disturbed areas to Refuge standards
- Assessment of economic impacts, and any loss of revenue, to USFWS to maintain/restore the integrity of this national Refuge
- Establishing a bond adequate to cover the actual costs of monitoring and mitigation, as determined by the studies and plans, above

We appreciate the magnitude of the work before you, to accomplish your mandate on behalf of the national public and the local citizens, in the face of industrial scale activity in the Refuge. Your careful assessment and planning of best practices for the unique features of the Refuge will preserve this world class natural resource and fulfill our mutual responsibilities.

Thank you for your consideration of the comments submitted, as you assess the potential environmental impacts and draft your plans.

Respectfully,

Mike Spearman

Sam Pace

Linda Joseph